

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

In re:

Fiddler, González & Rodríguez, P.S.C.

Debtor.

Case No.: 17-03403-MCF7

Chapter 7

**Noreen Wiscovitch-Rentas, as Chapter 7
Trustee of the Debtor, Fiddler, González &
Rodríguez, P.S.C.**

Adv. Proc. No.: 19-00302-MCF

Plaintiff

v.

César A. Gómez-Negrón, et al.

Defendants

MOTION FOR EXTENSION OF TIME

TO THE HONORABLE BANKRUPTCY COURT:

COMES NOW defendant César A. Gómez-Negrón, and very respectfully states, alleges and prays:

1. The complaint in this case was filed on May 15, 2019. See Doc. 1. The summons was issued on the same date. See Doc. 3. The appearing defendant was served with process by mail. Pursuant to Fed.R.Bankr.P. 7012(a), defendant's answer to the complaint is due on Friday, June 14, 2019.
2. The undersigning counsel will be traveling out of the country from Tuesday, May 28, until Wednesday, June 12, which is only two days before the deadline to file the answer. This trip had been scheduled before the filing of the complaint on May 15. Given defendants' need to search for and review documents related to the

allegations of the complaint, and the absence of the undersigning counsel from this jurisdiction, defendant will need more time to prepare his answer.

3. The initial conference has been set for September 10, 2019. See Doc. 6.
4. In order to prepare accurate and complete answers, the defendant respectfully requests an additional 30 days to file his answer, that is, until Monday, July 15, 2019, since July 14 is a Sunday. Since the initial conference is set for September 10, this extension of time would not delay the proceedings.
5. After consultation, counsel for the plaintiff has agreed to defendant's request for this extension of time.

WHEREFORE, the defendant respectfully requests an extension of time of 30 more days to file his answer to the complaint, extending the original filing date of Friday, June 14, 2019, to Monday, July 15, 2019.

Respectfully submitted.

In San Juan, Puerto Rico, May 25, 2019.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will notify all parties registered through their attorneys of record, including the Debtor, the case trustee, and the U.S. trustee.

TORO COLÓN MULLET, P.S.C.

P.O. Box 195383
San Juan, PR 00919-5383
Tel.: (787) 751-8999
Fax: (787) 763-7760

/s/ Ángel Sosa-Báez

Ángel Sosa-Báez
USDC-PR No. 219,010
E-mail: asosa@tcm.law

motion extension time answer